

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
NEWARK DIVISION**

**U.S. SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

vs.

**VUUZLE MEDIA CORP., VUUZLE
MEDIA CORP. LIMITED,
RONALD SHANE FLYNN, and
RICHARD MARCHITTO,**

Defendants,

-and-

VUMU MUSIC LLC,

Relief Defendant.

**Civil Action No. 2:21-cv-1226 (KSH)
(CLW)**

PLAINTIFF’S MOTION FOR ALTERNATIVE SERVICE

Pursuant to Rule 4(f)(3) of the Federal Rules of Civil Procedure, Plaintiff U.S. Securities and Exchange Commission (the “SEC”) respectfully moves the Court for an order authorizing it to serve the Amended Complaint and Summons (Dkt. Nos. 86 and 91) by alternative means upon Defendant Ronald Shane Flynn. The proposed alternative means is an email to an email address that Flynn is known to use. As set forth in the memorandum of law and declaration filed herewith, this alternative means is reasonably calculated to provide notice of the Amended Complaint and Summons in this matter.

Dated: March 24, 2022

Respectfully submitted,

/s/Daniel J. Maher

Devon L. Staren

Daniel J. Maher

U.S. SECURITIES AND EXCHANGE
COMMISSION

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on March 24, 2022, I served a copy of the foregoing upon all counsel of record using this Court's ECF system, and upon Defendant Flynn using the email rflynn48@gmail.com.

/s/ *Devon L. Staren*

Counsel for Plaintiff